

Knittel, Janette

From: Knittel, Janette
Sent: Thursday, June 04, 2020 8:59 AM
To: Goodman, Kathleen
Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Hi Kathleen. I'm sorry to bother you with this, but could you please send the 2019 O&M report and the pilot study report with that paragraph removed?

Also, how would it work if we would like changes made to the pilot study report? I'm guessing it's just not going to happen.

Regards,
Janette

From: Goodman, Kathleen <kathleen.goodman@woodplc.com>
Sent: Wednesday, May 27, 2020 4:37 PM
To: Knittel, Janette <Knittel.Janette@epa.gov>; MacDonald, Jennifer <Macdonald.Jennifer@epa.gov>
Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Janette—

Indeed. A template cover has been remade for all future documents that removes that paragraph.

Cheers,
Kathleen

Kathleen Goodman, LG., LHg., RG.

Principal Hydrogeologist
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Seattle, WA 98101 USA
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Mobile: 425-301-2700
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From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Wednesday, May 27, 2020 12:53 PM
To: Goodman, Kathleen <kathleen.goodman@woodplc.com>; MacDonald, Jennifer <Macdonald.Jennifer@epa.gov>
Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Hi Kathleen,

Yes, removing that paragraph solves the issue for these documents. I'm assuming that all future documents submitted to EPA also will not contain that paragraph.

Regards,
Janette

From: Goodman, Kathleen <kathleen.goodman@woodplc.com>
Sent: Wednesday, May 20, 2020 4:39 PM
To: Knittel, Janette <Knittel.Janette@epa.gov>; MacDonald, Jennifer <Macdonald.Jennifer@epa.gov>
Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Janette and Jennifer—

Thank you for your patience. We are going to just eliminate that whole paragraph regarding Copyright and Non-Disclosure. We will re-send the 2019 O&M and the CO2 Pilot Study reports to you with that paragraph removed.

Please let me know if that takes care of the problem. Apologies for any inconvenience.

Kind regards,
Kathleen

Kathleen Goodman, LG., LHg., RG.

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From: Knittel, Janette <Knittel.Janette@epa.gov>

Sent: Monday, May 18, 2020 9:36 AM

To: Goodman, Kathleen <kathleen.goodman@woodplc.com>; MacDonald, Jennifer <Macdonald.Jennifer@epa.gov>

Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Hi Kathleen. The addition of “the U.S. Environmental Protection Agency may post this report to the site electronic data room” to the disclaimer in the pilot study report doesn’t fix our problem. Please clarify what you mean by data room. We don’t need Wood’s permission to put documents into our records management system. So would posting to a data room include a webpage, and releasing to the public? Again, EPA should not need to request permission from Wood each time we want to release a document to the public and publish it to a webpage, and the disclaimer prevents that.

Regards,
Janette

From: Knittel, Janette

Sent: Monday, May 11, 2020 12:11 PM

To: Goodman, Kathleen <kathleen.goodman@woodplc.com>

Cc: Gormley, Sean <sean.gormley@woodplc.com>

Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Kathleen, I do have further questions. I’m sorry if I wasn’t clear – by second sentence I meant the one that was not marked out – “To the extent that we own the copyright in this report, it may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report.” If that sentence also is in the reports then it’s still not clear to EPA that we have permission to release documents to the public without asking Wood for permission, which is what started all of this. And of course which hinders our obligation to be transparent to the public about our work. Based on your email below, are you saying EPA has permission from Wood to release all documents in the future related to this facility?

Regards,
Janette

From: Goodman, Kathleen <kathleen.goodman@woodplc.com>

Sent: Monday, May 11, 2020 10:21 AM

To: Knittel, Janette <Knittel.Janette@epa.gov>

Cc: Gormley, Sean <sean.gormley@woodplc.com>

Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Hi Janette—

According to Sean Gormley, our regional manager, EPA does not need to request permission from Wood to release the document, and can release as needed. We will strike those sentences from the 2019 O&M report and resend it. Future documents will not include those two sentences.

Please let us know if you or your colleagues have further questions.

Kind regards,
Kathleen

Kathleen Goodman, LG.,LHg., RG.

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From: Knittel, Janette <Knittel.Janette@epa.gov>

Sent: Monday, May 11, 2020 9:06 AM

To: Goodman, Kathleen <kathleen.goodman@woodplc.com>

Subject: RE: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Hi Kathleen. The second sentence raises some questions for EPA and we're still not clear that EPA would have permission to publish the documents to the webpage. We're ok with the strikeouts, provided the change means EPA does not need to request permission from Wood each time we want to release a document to the public and publish to a webpage.

-Janette

From: Goodman, Kathleen <kathleen.goodman@woodplc.com>

Sent: Friday, May 08, 2020 2:12 PM

To: Knittel, Janette <Knittel.Janette@epa.gov>

Subject: FW: EPA question: releasing 2019 O&M Report (dated March 1, 2020)

Hi Janette—

Will the knockout below meets EPA's needs? The objective is that we do not want people altering or annotating the pages of the report and presenting them with the Wood logo or other identifiable Wood information. Unfortunately, we have seen that done before.

If that is acceptable to EPA, I can go ahead, make the change, and resubmit the document. If we need more changes than that knockout, it might take a day or 2.

Many thanks,
Kathleen

Kathleen Goodman, LG.,LHg., RG.

Principal Hydrogeologist
600 University Street, #600

From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Friday, May 8, 2020 1:00 PM
To: Goodman, Kathleen <kathleen.goodman@woodplc.com>
Subject: releasing 2019 O&M Report (dated March 1, 2020)

Hi Kathleen,

As we talked about today, EPA R10 will be updating our Corrective Action webpage for the former Rhone-Poulenc facility and would like to publish the 2019 Operations and Maintenance Report (dated March 1, 2020) with other documents on that page. Before we can release records for public viewing we are required to review the documents for personal and other information following federal regulations and guidance. This particular report has a "copyright and non-disclosure notice" as shown below. Before we can proceed with releasing the document for the webpage, we need permission from Wood that it agrees this record can be released to the public and published online by EPA. Please respond to this email stating such permission.

Also as we talked about, this disclaimer is not appropriate for work Wood is doing for the former Rhone-Poulenc facility. As a federal government agency the EPA has an obligation to be transparent with the public about work the EPA is involved in. You said you would talk with your internal legal office about modifying this notice to be appropriate for federal government's release of documents to the public. Let me know if any questions come up about that. Note that I may be interested in putting the pilot study report on the webpage too after the report is final.

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Thank you,
Janette

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